

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

KAREN SUMMERSET, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

LIBERTY MUTUAL INSURANCE
COMPANY,

Defendant.

Civil Action No. 1:25-cv-11121-PBS

**ASSENTED-TO MOTION FOR EXTENSION OF TIME TO RESPOND TO
COMPLAINT**

NOW COMES Defendant Liberty Mutual Insurance Company (“Liberty Mutual”) and hereby requests that this Court grant an extension of time to respond to Plaintiff Karen Summerset’s (“Plaintiff”) Complaint, ECF No. 1, through and including June 11, 2025. In support of its request, Liberty Mutual states the following:

1. Plaintiff filed the Complaint in this action on April 25, 2025. *See* ECF No. 1.
2. Liberty Mutual was served with the summons and Complaint on April 30, 2025.
3. Presently, pursuant to Fed. R. Civ. P. 12(a)(1), Liberty Mutual has until May 21, 2025, to file a responsive pleading.
4. Liberty Mutual has not previously requested any extension of time of the deadline to respond to the Complaint, and the time to file a response to the Complaint has not yet expired.
5. Liberty Mutual requests a three-week extension of time to file a responsive pleading because counsel for Liberty Mutual is in the process of gathering information to file a responsive pleading.

6. The undersigned counsel requested an extension to respond to the Complaint through and including June 11, 2025, from Plaintiff's counsel on May 19, 2025, to which Plaintiff's counsel assented.

7. Accordingly, as an extension of time would not prejudice Plaintiff, Liberty Mutual has shown good cause to extend the time within which it may serve a response to the Complaint.

8. This motion is made in good faith and not for the purpose of delay.

WHEREFORE, Liberty Mutual respectfully requests that the Court grant Liberty Mutual's request for extension of time to respond to the Complaint through and including June 11, 2025.

Respectfully Submitted,

Liberty Mutual Insurance Company,

By its attorney,

/s/ Kevin P. Polansky

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Dated: May 19, 2025

CERTIFICATE OF SERVICE

I, Kevin P. Polansky, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: May 19, 2025

/s/ Kevin P. Polansky

Kevin P. Polansky